

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
NEIMAN MARCUS GROUP LTD, LLC,	§	Chapter 11
	§	
Debtor.	§	Case No. 20-32519
	§	

**NOTICE OF APPEARANCE, REQUEST FOR
SERVICE OF PAPERS AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE, that the undersigned hereby appear as counsel for Gorski Group Ltd., a Canadian corporation (“Gorski”) as a true and perfected consignor, creditor warehouse lienholder and interested party in the above-captioned cases and hereby request, pursuant to Federal Rule of Bankruptcy Procedure 9010 and 11 U.S.C. §1109(b) that all copies and pleadings given or filed in these cases be given and served upon the below counsel:

Adam H. Friedman, Esq.
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PLEASE TAKE FURTHER NOTICE, that this request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, e-mail, hand delivery, telephone, telegraph, facsimile, telex, or otherwise: (1) that affects or seeks to affect in any way any rights or interest of any creditor or any party-in-interest in this

case, including Gorski with respect to (a) the debtor; (b) property of the estate or proceeds thereof, in which the debtor may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others that the debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or conduct by the delivery of any property, payment, or other conduct by Gorski.

PLEASE TAKE FURTHER NOTICE, that Gorski intends that neither this Entry of Appearance nor any later appearance, claim, or other pleadings shall waive (i) Gorski's right to have final Orders in non-core matters entered only after *de novo* review by the United States District Court; (2) Gorski's right to trial by jury in any proceeding related to this case; (3) Gorski's right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any rights, claims, actions, defenses, set-offs or recoupments to which Gorski is or may be entitled to under agreement, in law or at equity, all of which rights, claims, actions, defenses, set-off or recruitments Gorski hereby expressly reserves.

RESPECTFULLY SUBMITTED this 7th day of May, 2020.

OLSHAN FROME WOLOSKY LLP

By: /s/ Adam H. Friedman

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**ATTORNEYS FOR GORSKI GROUP,
LTD.**